

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Joshua Chartson BROWN-HILL

Case: 2:24-mj-30465
Assigned To : Unassigned
Assign. Date : 10/29/2024
Description: USA V. SEALED
MATTER (KB)

Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2022 - August 15, 2024 in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2251(a)	Sexual exploitation of children
18 U.S.C. 2252A(a)(5)(B)	Possess material that contains image of child pornography been mailed
18 U.S.C. 2252A(a)(2)	Receive/distribute material that contains child pornography mailed/shipped
18 U.S.C. 2422(b)	Use interstate/foreign commerce to persuade minor in sexual activity


This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: October 29, 2024

City and state: Detroit, Michigan


Complainant's signature

Special Agent Randal T. Cummings - HSI
Printed name and title


Judge's signature

Honorable Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF MICHIGAN

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Randal Cummings, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (“HSI”), of the United States Department of Homeland Security (“DHS”). I am assigned to the Special Agent in Charge (“SAC”), Office of Investigations, in Detroit, Michigan, located at 477 Michigan Ave, Suite 1850, Detroit, Michigan. I have been employed with HSI since August 2010. I have successfully completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I was previously employed from September 2005 through August 2010 with the U.S. Department of Labor - Office of Labor-Management Standards as a Lead Criminal Investigator. I received a bachelor’s degree in criminal justice from Michigan State University.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit does not contain every fact that I have learned during the

investigation, but instead includes only those facts I believe establish the requisite probable cause in support of a criminal complaint against Joshua Brown-Hill for violations of 18 U.S.C. §§ 2251, 2252A(a)(2), 2252A(a)(5)(B), and 2422(b).

PROBABLE CAUSE

3. In the early morning of August 15, 2024, a West Bloomfield Police Department Road Patrol Officer conducted a check of the Pine Lake Park in West Bloomfield, Michigan. The officer saw a black Chrysler 300 parked in the west lot of the park across three parking spots. The officer went up to the Chrysler where he saw a shirtless man, identified by his Michigan driver's license as Brown-Hill. Brown-Hill told the officer that there was another person with him, and that she was "of age." The officer had Brown-Hill specify the age of the person he was with, and he indicated "18."

4. As Brown-Hill waited by the patrol car, the officer walked and found Minor Victim 1 (MV1) laying on a blanket with a towel covering the area of her waist to the top of her thighs. MV1 spoke to officers and said that she did not have a driver's license. MV1 stated that she was 12 years old and had met Brown-Hill through Snapchat. She also informed officers that she told Brown-Hill her age, both verbally and through text messages.

5. Investigation showed that MV1 and Brown-Hill had engaged in sexual acts at the park. Brown-Hill was placed under arrest and transported to the West Bloomfield Police Department. Officers took MV1 home to her parents, who confirmed MV1's age.

6. Further investigation in the following days, revealed that MV1 met Brown-Hill on Snapchat when she was approximately 10 years old. Brown-Hill sent MV1 a friend request, which MV1 accepted, and they began exchanging messages. Brown-Hill had picked her up from her home on two separate occasions when she was approximately 10 years old. During those encounters, the two of them went to the park and talked. She later blocked Brown-Hill's Snapchat account.

7. However, in approximately June or July 2024, MV1 and Brown-Hill began exchanging messages again. During their exchanges, Brown-Hill sent photos and videos of his exposed genitalia and in some of the photos he was masturbating. MV1 also sent photos to Brown-Hill of her clothed buttocks. MV1 knew Brown-Hill's actual age, and he knew hers.

8. During this same period, Brown-Hill went to MV1's residence and he asked her to perform sexual acts on him.

Brown-Hill's Snapchat Account Review

9. As part of the investigation, I received and reviewed Snapchat account information for Brown-Hill obtained by the West Bloomfield Police Department through the issuance of a state search warrant.

10. A review of data showed messages with a Snapchat account maintained by MV1. In the messages, Brown-Hill made repeated overtures to MV1. On August 12, 2024, MV1 said she might be going on a trip at some point, Brown-Hill responded “WTF” and “That’s a long ass time till I can pound u.” The conversation continued about which adult MV1 would stay with if she didn’t go out of town. Brown-Hill responded with: “Ughhh fuck” and “I was hoping you would be alone so I can finally come in a night.”

11. On August 14, 2024, MV1 and Brown-Hill messaged each other about laying face to face and that if they want to lay together for long MV1 would have to leave the house. Brown-Hill messaged, “They need to let u leave idc if u to young they should still let u.” MV1 responded, “I’m 12” and “Where would I be going?” Brown-Hill replied, “wit me ofc.” MV1 messaged Brown-Hill that her mom had said MV1 was going out of town in a couple days. Brown-Hill later replied: “Daaaaamn no pussy for a while.”

12. On August 15, 2024, messages were sent by Brown-Hill to MV1 that stated: “Good Slut”... “On my way.”

Forensic Examination of Brown-Hill's Apple iPhone 12 Pro

13. On August 15, 2024, law enforcement examined Brown-Hills' Apple iPhone 12 Pro pursuant to a search warrant.

Exploitation of MV1

14. A review of Brown-Hill's Apple iPhone 12 showed text messages between Brown-Hill and MV1 beginning on July 23, 2022. On that date, Brown-Hill stated to MV1:

- "where to boo n if u sit on my lap ima instantly get hard n put my hand up your shirt."
- "Yea it doima bend u over l tie yo arms around it n fuck u from the back."
- "I'd pull yo pants down a bit n rub my fingers between the crack of yo ass n grabbing yo cheeks."

15. Around July 24, 2022, Brown-Hill messaged MV1, saying: "very bad I wanna kno how it feels to have young pussy on my dick," and "Do you have pictures I can beat my dick to?"

16. MV1 referred to the age difference between her and Brown-Hill on September 2, 2022, as being 13 years. About five days later, MV1 sent a partially clothed photo to Brown-Hill, before she stopped responding to Brown-Hill's messages on September 21, 2022. Brown-Hill attempted to message MV1 numerous times between September 21, 2022, and January 27, 2023, but did not receive a response.

17. On April 7, 2023, Brown-Hill messaged MV1 “U want me to leave u alone I’ll stop bothering u if u say yes.” MV1 said: “Please do I just don’t think it’s right for an 11-year-old to be with A person in there 20’s” and “You would get in really big trouble if anyone knew.” Brown-Hill replied: “It’s ok I understand sweetheart I missed u fr but I won’t stick around but I’d like to check on u if that’s ok with u.”

18. The next day, Brown-Hill messaged MV1: “Idk I like young girls buy yo ass just special.” Brown-Hill later asked: “U don’t think ur special to me?” and “Ok baby trying to become you side dude tho.” Brown-Hill and MV1 continued the conversation, which included discussions about sexual acts and his penis size. Brown-Hill sent MV1 a picture of his exposed penis and later in the conversation Brown-Hill asked MV1: “so I can get that tight lil 11-year-old pussy put around this dick soon?”

19. Then, on April 11, 2023, Brown-Hill asked for a picture of MV1’s buttocks. Images were exchanged. From about April 2023, through July 2024, the conversation between the two continued to be sexual. During this period after Brown-Hill asked for an image of MV1, Brown-Hill received approximately 28 messages that included photographs and videos, including images that meet the federal definition of child pornography.

20. For instance, on May 6, 2023, Brown-Hill sent MV1 a message stating: “Let me see that lil fat pussy.” MV1 sent a sexually explicit image of her genitalia to Brown-Hill; the image meets the federal definition of child pornography. Apparently dissatisfied with the image, Brown-Hill directed MV1 to make a change to the image, with which she complied and sent an additional sexually explicit image. Brown-Hill responded: “Fat pussy lil young bitch.”

21. Brown-Hill went on to direct MV1 to send him additional sexually explicit images and videos, including involving sexual penetration with an object. MV1 sent the videos/images requested by Brown-Hill. The images and videos sent meet the federal definition of child pornography.

22. The messages between the two continue where Brown-Hill commanded: “Show that fat ass whore I want a long video” and to “N rub the toy on it to whore.”

Exploitation of MV2

23. A review of Brown-Hill’s phone extraction also uncovered Brown-Hill’s enticement and solicitation of another minor – Minor Victim 2 (MV2), an approximately 13-year-old child. From about April 19, 2024, through about June 12, 2024, attachments to SMS messages between MV2 and Brown-Hill recovered contained photographs and videos with child sexually abusive content, including MV2’s fully exposed breasts and genitalia, along with video of MV2 performing

sexual acts on herself. These images related to chats between Brown-Hill and MV2. Attachments were also found where Brown-Hill sent MV2 photographs of his exposed penis.

24. Beginning around April 19, 2024, MV2 sent a message to Brown-Hill asking: “why yu calling me a child.” Brown-Hill replied: “No reason.” MV2 asked: “but wasn’t yu willing to fw this child?” (I know from my training and experience that “fw” stands with an expletive meaning “mess with”). Brown-Hill replied: “lol shh.” They continue to message each other about what they are doing, how MV2 looks, and how MV2 is still his sexy little slut. The following exchange then took place:

- MV2: daddy how old are you again
- Brown-Hill: 25 and U
- MV2: 13
- Brown-Hill: I’ll put u through a wall still

25. On April 20, 2024, Brown-Hill asked MV2 “Wya.” MV2 stated she was in her room with her sister. Brown-Hill wrote: “Daddy big dick gonna be out for u.” The conversation continued about his penis size. Brown-Hill told MV2 to call him and sent MV2 an image of his exposed penis. MV2 told him: “i don’t wan to” “daddy everybody is here.” In MV2’s text message to Brown-Hill, she referenced having sent him images and Brown-Hill replied: “Idc daddy was having fun talking to u.”

26. During a message exchange on April 21, 2024, Brown-Hill sent MV2 what appears to be a recording of a FaceTime video of her naked in the bathtub, where the split screen showed both Brown-Hill and MV2 appearing to be engaged in self-stimulation.

27. On May 22, 2024, Brown-Hill and MV2 exchanged messages relating to the sending of sexually explicit images/videos. Brown-Hill affirmed that MV2 could go into a bathroom so that she could send him what he requested. He said: “u go to the bathroom ima wanna see them down to.” Brown-Hill also referenced MV2 as “slave” in the messages. Brown-Hill gave MV2 directions on what to include in a video; MV2 complied, sending Brown-Hill a sexually explicit video of her exposed genitalia. MV2 told Brown-Hill after sending the video that she “ha[d] to go back to [her] seat.” MV2 later asked Brown-Hill if he would still want her or another little girl when she gets older. Brown-Hill responded, “Yes I’d still want u slut n idk if id want younger girls when i get older maybe” and “If daddy still like younger would u b ok with it.” MV2 responded: “no.”

28. On May 25, 2024, Brown-Hill again directed MV2 in the making of a sexually explicit video involving MV2 engaging in masturbation. Throughout the messages, he referred to MV2 as “slut,” “whore,” and called her “daddy’s sexy little toy.” In the messages surrounding the video, Brown-Hill wrote: “Age,” and MV2 responded: “13.” Brown-Hill continued to direct MV2 to conduct sexual acts

on herself. At various points, Brown-Hill said things in the messages like: “Fix your face whore,” “Move you hand o wanna see it,” “I’m not fucking asking,” “I wanna only see pussy n shirt up,” and “Hurts huh.” Brown-Hill then messaged MV2: “Get dressed slut ppl around u.”

Exploitation of MV3

29. Additional text messages from Brown-Hill’s Apple iPhone 12 Pro show Brown-Hill engaged in a similar pattern with another minor victim, Minor Victim 3 (MV3), an approximately 14-year-old child, beginning about December 9, 2022. Numerous times through their exchanges in December 2022 and January 2023, MV3 told Brown-Hill about things that were happening at her school. For instance, on January 17, 2023, MV3 sent a picture of her grades for her 8th grade classes.

30. On December 9 and 10, 2022, in the context of their conversations, Brown-Hill received videos from MV3 of her unclothed genitalia, and using her fingers and a toothbrush to masturbate. In one response Brown-Hill said: “damn mama ima love it over there,” an image of his exposed penis masturbating, followed by a message, “Dick hard asf.”

31. On December 16, 2022, Brown-Hill messaged, “What’s your age limit ma.” MV3 responded, “it depends but idk 15 probably.” The two continue to talk about Brown-Hill’s age where he eventually stated he was 24. Brown-Hill wrote,

“I’ll leave u alone if u not comfortable.” MV3 responded, “it’s ok ig when was you gon tell me tho.” MV3 sent Brown-Hill an image of her laying down in a sports bra and what appears to be pajama bottoms. Brown-Hill asked, “What’s under them pants” and she replied, “my underwear.” Brown-Hill asked to see them. MV3 sent an image of her standing in front of a mirror with her underwear on showing her buttocks and her face covered by an emoji. Brown-Hill stated, “what about them coming off.” MV3 sent another image of her standing in front of the mirror without her underwear bearing her naked buttocks with her face covered by an emoji. Brown-Hill messaged, “Yea yo young ass gonna get fucked” and later, “O ok gimme that fat wet lil Pussy I wanna see how much of me can fit.” MV3 sent Brown-Hill a video of her laying down wearing only a shirt with her exposed vagina masturbating. Brown-Hill stated, “damn u gonna make me weak” and “Yo pussy evil mamas I love it baby I want u to make me hold my nut back mamas.”

32. The messages and videos of MV3 and sent to Brown-Hill continued until March 20, 2023, when the number used by MV3 to message Brown-Hill appeared to change.

Exploitation of MV4

33. Additional text messages from Brown-Hill’s Apple iPhone 12 Pro show Brown-Hill engaged in a similar pattern with another minor victim, Minor

Victim 4 (MV4), an approximately 13-year-old child. Beginning about April 10, 2023, attachments to SMS messages between MV4 and Brown-Hill contained activity where Brown-Hill enticed MV4 to send sexual images.

34. On April 10, 2023, MV4 asked what his name should be on the thread and Brown-Hill tells MV4 to save his name as “josh.” Brown-Hill and MV4 continue to chat throughout the day about what they are doing. Brown-Hill asked, “O ok can I ask what u got on??” MV4 stated: “Oh legging and a tshrit.” Brown-Hill asked if he could see and later wrote, “I’ll bite u” and “Yes I will right on yo thighs.” Brown-Hill wrote, “I sorry if I get sexual n u don’t like it let me kno.” The messages between Brown-Hill and MV4 begin to turn in a sexual nature. Brown-Hill later informed MV4 that he was 24.

35. Brown-Hill solicited MV4 to commit a sex act on him, and sent MV4 an image of his exposed penis during their text messages.

36. On April 14, 2023, Brown-Hill asked if MV4 was in the shower and if she “Can u turn around for daddy.” MV4 sent an image of her clothed backside in response to Brown-Hill’s message. Brown-Hill messaged, “Good girl rub that pussy.” Brown-Hill referred to MV4 as a “slut” during this exchange. Brown-Hill directed MV4 regarding the content of the images she sent and MV4 complied with Brown-Hill’s requests.

37. The messages between Brown-Hill and MV4 continued until May 8, 2023. Brown-Hill attempted to communicate with MV4 until July 5, 2023, with no response from MV4.

Exploitation of MV5

38. Additional review of Brown-Hill's phone extraction also uncovered Brown-Hill's enticement and solicitation of another minor – Minor Victim 5 (MV5), an approximately 13-year-old child. From about December 20, 2022, through about August 11, 2024, attachments to SMS messages between MV5 and Brown-Hill recovered photographs and videos with child sexually abusive content, including MV5's fully exposed genitalia, along with video of MV5 performing sexual acts on herself. Attachments were also found where Brown-Hill sent MV5 photographs of his exposed penis.

39. During the messages between Brown-Hill and MV5, in December 2022, Brown-Hill asked MV5 her age, and she said: "13." At one point, MV5 told Brown-Hill she would do what he asked, and Brown-Hill stated: "I wanna hear u cry tonight." MV5 sent Brown-Hill a sexually explicit video. Later in the conversation, Brown-Hill sent: "U kno what double penetrating is right?" "We doing that ma."

40. Brown-Hill and MV5 continued to communicate about MV5's grades, what were doing, expressed love for each other, and what appears to be playing online video games together such as chess and 8ball.

41. In their communications, Brown-Hill requested sexually explicit videos from MV5 writing for example, "Spanks I want 5 hard slaps on ur ass now n I wanna see em done" and "No I want a video done now."

Additional Instances of Receipt and Possession of Child Sexually Abusive Material

42. Group chats forensically extracted from Brown-Hill's Apple iPhone 12 Pro showed Brown-Hill using the alias "King Tut," and joining a group on Telegram, a social media platform, via a link called "nolimits" on or about August 11, 2024.

43. A video from that social media platform on Brown-Hill's iPhone disclosed the group chat "nolimits" contained the wording "serious buyers only" and "Text me to get added to the No limit" depicted on the group chat iPhone screen.

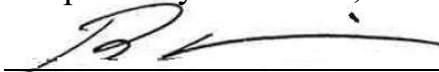
44. Six videos were disseminated within the group chat, and all appear to be prepubescent female children engaged in sexually explicit acts, including vaginal penetration, by adult men. These videos all meet the federal definition of child pornography.

45. A second group chat where Brown-Hill again joined under the alias “King Tut” around August 4, 2024, showed images found within the attachments section of the group chat contained approximately 320 video/mp4’s disseminated within the group. Your Affiant viewed the video/mp4’s that were recovered during the forensic examination. The videos contained prepubescent and pubescent female children engaged in sexually explicit conduct.

CONCLUSION

46. Based on the above information, there is probable cause to believe that Joshua Brown-Hill, within the Eastern District of Michigan, did knowingly and willfully engage in the sexual exploitation of minor children by enticing, persuading, and receiving visual depictions such as images and videos of minor children engaging in sexually explicit conduct in violation of 18 U.S.C. §§ 2251, 2252A(a)(2), 2252A(a)(5)(B), and 2422(b).

Respectfully submitted,



Randal Cummings, Special Agent
U.S. Department of Homeland Security

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

Date: October 29, 2024